

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #11
Final
Warren Steel Holdings
C5AV
Warren, OH
Latitude: 41.2629796 Longitude: -80.7990185

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Date: 10/4/2018

Reporting Period: 09/01/2018 through 10/02/2018

1. Introduction

1.1 Background

Site Number:	C5AV	Contract Number:	
D.O. Number:		Action Memo Date:	2/20/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/24/2018	Start Date:	4/24/2018
Demob Date:	10/2/2018	Completion Date:	10/2/2018
CERCLIS ID:	OH0011207	RCRIS ID:	OHD066060608
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No

data is available on whether or not the transformers contain oil/pcb oil. EPA will investigate the transformers as part of the Removal Action and handle appropriately.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

For this reporting period ERRS arranged a subcontractor to drain oil from/remove pcb contaminated transformers at the Warren Steel Holdings facility.

Note: All the transformers located at the abandoned substation located near the banks of the Mahoning river were addressed. Any transformer or capacitor that exhibited less than 50 ppm pcbs during the June 2018 sampling event were either drained or completely removed under an OPA response action (response.epa.gov/WSHOPA).

2.1.2 Response Actions to Date

From September 1 through September 16th, ERRS arranged for a subcontractor to complete all work related to pcb contaminated transformer oil/transformers. In addition, final arrangements for the removal of the unused HILTI gun cartridges were made.

During the week of September 17th, ERRS and their subcontractor focused work efforts at the abandoned substation for the facility. The majority of the work at the substation is being performed under an OPA funded removal action except for 7 transformers that exhibited PCBs greater than 50 ppm during the June 2018 sampling event.

On Wednesday September 19, 2018, 120 pounds of unused HILTI cartridges were removed from site for incineration (explosive).

On Monday, September 24th, 2018, ERRS and their subcontracted inspected all the transformers at the main facility that had detections for PCBs in order to plan the site work. It was determined that 2 transformers would be too large to completely remove and 1 transformer would require draining prior to being removed. The two transformers that will remain on site had a pcb content of 25 and 4 ppm.

On Wednesday, September 26th, oil was drained from the 3 identified transformers on the main facility. The oil was sent to the subcontractors facility for recycling.

On Thursday, September 27th, ERRS and their subcontractor dismantled and staged pcb contaminated transformers for removal at the main facility.

On Friday, September 28, 2018, oil (2,300 gallons) was drained from two transformers located at the abandoned substation. June 2018 sampling indicated the oil in the two transformers that were above 50 ppm PCBs (64 and 99 ppm). The oil was sent to the subcontractors facility for eventual treatment and recycling. These transformers were left on site as they were too large to transport. Four smaller transformers from the substation were removed and staged at the main facility for removal (all greater than 150 ppm pcbs). ERRS and their subcontractors completed dismantling and staging all but 3 pcb contaminated transformers for removal.

No work occurred on Monday, October 1, 2018 due to scheduling conflicts.

On Tuesday, October 2, 2018, a crane was delivered to site to move the remaining three transformers. Twenty-five pcb contaminated transformers were removed from the site and sent to the subcontractors facility for draining/recycling. Of the 25 transformers removed 17 were less than 50 ppm pcbs, 6 were between 50 and 500 ppm pcbs and 2 were above 500 ppm pcbs (747 ppm). All site support trailers and equipment were called off and scheduled for removal from site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Bulk Solids	Solid	56.5 tons	NA	re-use - ESSIX Resources	NA
Cylinders	Solid	38	NA	recycling	Airgas
Cylinders	Solid	10	NA	recycling	Praxair
Non-Haz Site Debris	Solid	80 tons	Various	landfill	American Landfill, Waynesburg, Ohio
K061 Waste	Solid	96 tons	Various	stabilization/landfill	U.S. Ecology, Bellevue, Michigan
Fire Extinguishers	each	200	NA	re-use/recycling	Fire Extinguisher Service and Sales, Cleveland, Ohio
93% Sulfuric Acid	liquid	1,625 gallons	NA	re-use - UNIVAR	NA
Hypochlorite Solution	liquid	650 gallons	NA	re-use - UNIVAR	NA

Asbestos	solid	20 pounds	NA	landfill	American Landfill, Waynesburg, Ohio
Calcium Carbide	solid	2 tons	NA	re-use ESM Resources	NA
Waste oil	liquid	6,500 gallons	NA	disposal	Safety-Kleen Systems, Kent, Ohio
Waste oil/grease	liquid/solid	107 drums	005038600FLE	disposal	EQ Detroit, Detroit, MI
Acid Waste Stream	liquid	5 drums, 6 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio
Basic Waste Stream	liquid	9 drums 3 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio
Hydrogen Peroxide	liquid	2 drums	19223918JJK	disposal	Chemtron Corp, Avon Ohio
Flammable	liquid	2 drums	19223918JJK	disposal	Chemtron Corp, Avon Ohio
paint material (oil based, latex, aerosols)	liquid	1 drum, 5 cubic yard	19223918JJK	disposal	Chemtron Corp, Avon Ohio
PCB	solid	1 cubic yard	019223919JJK	disposal	Wayne Disposal Inc, Belleville, MI
PCB	liquid	1 tote	019223920JJK	disposal	Veolia Technical Solutions, Port Arthur Texas
lead acid batteries	solid	600 pounds	19223938JJK	disposal	Chemtron Corp, Avon Ohio
miscellaneous	liquid	36 drums, 11 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio
unused HILTI cartridges	solid	120 pounds	018361408JJK	incineration	Heritage Thermal Services, Inc. East Liverpool, Ohio
pcb contaminated mineral oil	liquid	10,200 gallons	multiple BOL	recycling	Emerald Transformers PPM LLC, Twinsburg, Ohio
pcb contaminated metal (transformers)	solid	24.5 tons	multiple BOL	recycling	Emerald Transformers PPM LLC, Twinsburg, Ohio

Regional Metrics

This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
Contaminant(s) of Concern	Number of workers on site	6
	acids, bases, K061 dust, PCBs	

Oil Response Tracking

Estimated volume	Initial amount released	NA
	Final amount collected	NA
CANAPS Info	FPN Ceiling Amount	NA
	FPN Number	NA
	Body of Water affected	NA

Administrative and Logistical Factors (Place X where applicable)

Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts
UAO	NPL site	Relocation

DOJ involved	Remote location	Drinking water impacted
Criminal Investigation Division involved	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for \$2 Million	X Statutory Exemption for 1 Year	Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	1,200	gallons
Solid waste reused - Calcium Carbide sent back to manufacturer	2	tons
Solid waste reused -Sulfuric Acid sent back to manufacturer	1,500	gallons
Solid waste reused - Hypochlorite Solution sent back to manufacturer	600	gallons
Solid waste reused -miscellaneous material sent back to manufacturer	56.5	tons
Fire Extinguishers - re-used/recycled	200	each
Solid waste recycled - General	25	pounds
Solid waste recycled - Oil	10,204	gallons
Solid waste recycled - metal (transformer)	24.5	tons
Water Used	NA	gallons

2.2 Planning Section

2.2.1 Anticipated Activities

none - response complete

2.2.1.1 Planned Response Activities

none- response complete

2.2.1.2 Next Steps

none- response complete

2.2.2 Issues

During the week of August 27, 2018, EPA and START marked transformers that were above 50 ppm pcbs at the abandoned substation for CERCLA removal. There were 5 small transformers (approximately 200 pounds each) marked, two of which were located on the ground and disconnected. upon returning to the site the week of September 17th to begin work on the transformers, it was discovered that someone had cut the lock from a gate and stolen one of the transformers on the ground. The incident was reported to the Warren Steel Holdings site security who filed a police report. (note site security is paid for by an attorney for the former facility, not EPA).

2.3 Logistics Section

ERRS provided all logistics for the site

2.4 Finance Section

2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery order was issued to ERRS for \$300,000 to begin response actions.

On May 22 the ERRS Ceiling was increased to \$425,000.

On July 11 the START ceiling was increased to \$43,850

On July 17, 2018 the OSC requested and management approved an ERRS ceiling increase of \$250,000 (new ceiling \$675,000)

On September 4th, the START TDD was increased to \$50,000

Note: a credit for transformer oil (less than 50 ppm) and transformer carcasses will be applied to the project when final invoicing is complete.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$675,000.00	\$435,000.00	\$240,000.00	35.56%

TAT/START	\$50,000.00	\$38,000.00	\$12,000.00	24.00%
Intramural Costs				
Total Site Costs	\$725,000.00	\$473,000.00	\$252,000.00	34.76%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day

2.5.2 Liaison Officer

OSC Steve Wolfe

2.5.3 Information Officer

OSC Steve Wolfe

3. Participating Entities

3.1 Unified Command

OSC Steve Wolfe

3.2 Cooperating Agencies

4. Personnel On Site

1 EPA
1 START
5 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

NCP and CERCLA.